

# **EXHIBIT 261**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

Civil Action No. 1:14-  
cv-14176-ADB

PRESIDENT AND FELLOWS OF HARVARD COLLEGE  
(HARVARD CORPORATION),

Defendant.

DECLARATION OF [REDACTED]

I, pursuant to 28 U.S.C. § 1746, declare the following:

1. I am an individual over eighteen years old and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and is fully competent to declare as to matters stated herein.

2. I reside in [REDACTED] I am a first-generation immigrant, and I have three children, [REDACTED] and [REDACTED]

3. [REDACTED] is a [REDACTED] at [REDACTED] and plans to apply for admission to Harvard College.

4. I became a member of Students for Fair Admissions ("SFFA") in April 2016 because I support its work and believe that Harvard College and many other colleges and universities wrongly discriminate against Asian-American students.

5. I paid the membership fee when I joined SFFA in April 2016.

6. I have agreed to participate in SFFA's lawsuit against Harvard and have received updates about the status of the case from Mr. Blum and from SFFA's attorneys. They have

answered my questions and afforded me the opportunity to have input and direction on SFFA's case. I also communicate with [REDACTED] about the case.

I declare under penalty of perjury that the foregoing is true and correct, [REDACTED]

Executed on this day, June 28, 2016. [REDACTED]